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## MEMORANDUM ENDORSED

July 26, 2021

**VIA ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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ELECTRONICALLY FILED  
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Re: *United States v. Ashley Bourdier, et al.*, 20-CR-689 (GHW)

Dear Judge Woods:

I am the attorney for Ashley Bourdier, defendant in the above-referenced matter. With the consent of the Government, I request an approximately 45-day adjournment of the status conference currently scheduled for Wednesday, July 28, 2021 at 10:00 am for two reasons. The first reason for the request is that defendant Ashley Bourdier submitted a request for admission into the Young Adult Offender Program (YAOP), but was denied admission to the program.<sup>1</sup> Ms. Bourdier has now submitted an application for a deferred prosecution to the Government and we wish to await the outcome of that decision before proceeding further. Ms. Bourdier's co-defendant, Christopher Ferrera, who is younger than Ms. Bourdier, was admitted to the YAOP and in light of that and for other reasons, I believe that Ms. Bourdier is an appropriate candidate for deferred prosecution. The second reason for the adjournment request is that I am a member of the trial team in *United States v. Edward Bases, et al.*, 18-CR-48 (N.D. Ill.), a criminal trial in Chicago in the Northern District of Illinois, which is moving more slowly than expected and will extend through at least this week. I expect to remain in Chicago for the remainder of the week.

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<sup>1</sup> Ms. Bourdier is 28-years-old and the YAOP program has a maximum age cutoff of 25. Ms. Bourdier requested a waiver, but was denied admission to the program.

I have communicated with Assistant United States Attorney Thomas Burnett, who advises that the Government consents to the adjournment request. The parties consent to the exclusion of time from July 28, 2021 to the next adjourned date, in the interests of justice.

I thank the Court for its continued consideration.

Respectfully submitted,  
/s/  
Renato C. Stabile

cc: AUSA Thomas Burnett  
(via ECF)

Application granted. The status conference scheduled for July 28, 2021 is adjourned to September 24, 2021 at 10:00 a.m. The conference will take place in Courtroom 12C, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 49.

SO ORDERED.

Dated: July 27, 2021  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge